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16
17 *Counsel for Navient Solutions, LLC*
18 and *Navient Credit Finance Corporation*

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1 Pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, as made applicable to this
2 proceeding by Rule 7056 of the Federal Rules of Bankruptcy Procedure, Defendants Navient
3 Solutions, LLC and Navient Credit Finance Corporation (together, "Defendants"), through this
4 Motion, respectfully move that this Court:

5 (a) Grant summary judgment in favor of Defendants;
6 (b) Enter a judgment that Plaintiff Oscar D. Teran's ("Plaintiff") Bar Study loan is
7 excepted from discharge absent a showing of undue hardship;
8 (c) Dismiss the remainder of Plaintiff's complaint as moot; and
9 (d) Grant such other relief as is just and proper under the circumstances.

10 Respectfully submitted,

11 /s/ Payam Khodadadi
12 Dated: July 30, 2021
13 Payam Khodadadi (SBN 239906)
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27 *Counsel for Navient Solutions, LLC*
28 *and Navient Credit Finance Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2021, I electronically transmitted the foregoing document entitled **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** to the Clerk's Office of the United States Bankruptcy Court, Northern District of California, using the Court's CM/ECF System for filing and service via transmittal of a Notice of Electronic Filing email from the Court to the registered email addresses of the interested parties in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 30, 2021 at Los Angeles, California.

By: /s/ Payam Khodadadi
Payam Khodadadi